

EXHIBIT 6

Declaration of Abigail Panter

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
CIVIL ACTION NO: 1:14-CV-954-LCB-JLW**

**STUDENTS FOR FAIR ADMISSION,
INC.,**

Plaintiff,

v.

**THE UNIVERSITY OF NORTH
CAROLINA AT CHAPEL HILL, et
al.,**

Defendants.

DECLARATION OF ABIGAIL PANTER

I, Abigail Panter, hereby make this declaration from my personal knowledge and, if called to testify to these facts, could and would do so competently:

I. Background and Role at the University

1. I am the Senior Associate Dean for Undergraduate Education in the College of Arts and Sciences (the “College”) at The University of North Carolina-Chapel Hill (“UNC-Chapel Hill” or the “University”).

2. I received a B.A. in Psychology and French Studies from Wellesley College in 1985, a M.A. in Psychology from New York University in 1987, and a Ph.D. in Psychology from New York University in 1989. I joined the University in 1989 as an assistant professor in the Department of Psychology and Neuroscience in the College. On July 1, 2014, I became the Senior Associate Dean for Undergraduate Education in the College. I report directly to Kevin Guskiewicz, the Dean of the College.

3. As Senior Associate Dean, I oversee the College’s undergraduate academic mission as it relates to curriculum development and instructional planning processes, including for the first-year curriculum, the general education curriculum, new departmental and interdisciplinary courses and programs, undergraduate research opportunities, and innovative instruction. I also oversee the College’s student academic support services and initiatives. Additionally, I coordinate the scholarship and honors programs within the College.

4. As a psychologist, I develop instruments, research designs, and data-analytic strategies for applied research questions in the areas of higher education,

personality, and health. One focus of my research is the educational outcomes and benefits of diversity in higher education. I was a principal investigator for the Educational Diversity Project, a multi-year, \$1.5 million project to examine the role of race and other factors in law school settings. I am also the principal investigator for The Finish Line Project, a \$3 million “First in the World” multi-year grant from the U.S. Department of Education that systematically investigates new supports and academic initiatives for student success, especially for first-generation college students. I am also co-principal investigator on a new multi-year, \$2 million collaborative grant from the National Science Foundation to improve undergraduate student success in science, technology, engineering, and mathematics courses through data systems and targeted support. UNC-Chapel Hill has been the primary site for these research projects.

5. I am active nationally in my field. I am a former President of the American Psychological Association’s (“APA”) Division on Quantitative and Qualitative Methods, a former member of the APA’s Committee on Psychological Assessment and Testing, as well as a former member of the Social Security Administration advisory panel on disability determination. I am also a former member of the Educational Testing Service’s Graduate Record Examinations Advisory Board and served as chair of its Research Committee and *ex officio* member of its Technical Advisory Committee. I am a fellow of the APA and a current member of the APA’s Council of Representatives for the Division of Quantitative and Qualitative Methods (second term). I was associate editor of the APA journal, *Cultural Diversity and Ethnic Minority Psychology*. I regularly advise federal agencies, national advisory panels, and editorial boards.

6. I teach both undergraduate and graduate students. At the undergraduate level, I teach statistics, research methods, and a first-year seminar on communicating research results to others. I teach graduate students in classes on advanced statistical modeling and psychometric theory.

7. I have received several awards for my teaching and mentoring, including the Tanner Award, the J. Carlyle Sitterson Award, a Bowman and Gordon Gray Distinguished Professorship, and the APA's Jacob Cohen Award for Distinguished Teaching and Mentoring.

8. I currently serve on several University-wide advisory committees. I chair the Advisory Committee on Undergraduate Admissions ("Advisory Committee"). I also chair the Committee on Race-Neutral Strategies, a committee established by the Advisory Committee. I am also a member of the Educational Benefits of Diversity Working Group and serve as a member of its Data Inventory and Assessment Plan Subcommittee.

9. I have also served in major University leadership roles at UNC-Chapel Hill, including serving as chair for the following University bodies: Faculty Hearings Committee; Chancellor's Advisory Committee; Status of Women Committee; and Appointments, Promotion, and Tenure Committee. I also chaired numerous advisory boards focusing on faculty teaching excellence and curricula as well committees for the review and hiring of faculty colleagues, center directors, and key administrators at UNC-Chapel Hill.

II. The College is Committed to Fostering the Educational Benefits of Diversity

10. The College is composed of more than 70 departments, curricula, programs, centers, and institutes and offers more than 50 academic majors.

11. The College is the largest academic unit at the University and is home to more than 16,000 undergraduate students. Additionally, the College serves all incoming students as they complete their general education curriculum. The College has more than 1,000 faculty members who teach 85 percent of all undergraduate hours at the University.

12. As the oldest and largest school at the University, the College is uniquely positioned to further the University's mission to "serve as a center for research, scholarship, and creativity and to teach a diverse community of . . . students to become the next generation of leaders." (Ex. 32 (The Mission Statement of the University of North Carolina, Chapel Hill), UNC0323722.)

13. The College's goals are reflected in our mission statement: "To think, communicate, collaborate, and create for meaningful lives." This statement reflects our goal of encouraging analytical and creative thinking and the development of strong communication and collaboration skills. Indeed, research and learning experiences are collaborative efforts, and the ability to work cooperatively toward a shared goal is essential.

14. As used in our mission statement, "for meaningful lives" is a recognition that a broad and deep liberal arts education provides perspective, context, and understanding. It recognizes that today's students could likely have multiple careers—

and our job is to provide the foundation that permits them to adapt and excel in an increasingly diverse society.

15. The College's mission statement also reflects the commitment to public service that is part of the University's ethos. We strive to be the very best global public research university; one that also serves the people of North Carolina. We encourage our students, faculty, and staff to contribute meaningfully to North Carolina, the nation, and the world.

16. Diversity, defined broadly, is critical to the pursuit of our mission. Diversity refers to all of the ways in which people differ.

17. The College cannot achieve its goal of educating outstanding students who will discover innovative solutions to the world's greatest challenges without providing them with a learning environment that reflects the diversity of the world in which we live.

A. The educational benefits of diversity are real and meaningful

18. In my nearly 30 years of experience as a professor and a senior-level administrator, I have personally experienced and observed the significant educational benefits of diversity in general, and racial and ethnic diversity in particular. I am familiar with the academic literature that shows that racial and ethnic diversity yields important educational benefits, and I have conducted research on the subject.

19. In 2017, the Provost's Office issued a report, the Educational Benefits of Diversity and Inclusion for Undergraduate Students at the University of North Carolina at Chapel Hill, that recognized the many benefits of diversity, including: promoting the robust exchange of ideas; broadening and refining understanding; fostering innovation

and problem-solving; preparing engaged and productive citizens and leaders; and enhancing appreciation, respect, and empathy. (Ex. 34 (The Educational Benefits of Diversity and Inclusion for Undergraduate Students at the University of North Carolina at Chapel Hill), UNC0349694-712).

20. As a professor teaching both undergraduate and graduate students, I have observed that a diverse learning environment fosters creativity and enables the pursuit of solutions from many different perspectives. A diverse classroom broadens the perspectives and life experiences that students bring to bear when confronting an issue; these varied viewpoints allow students to come to understand the issue in a multi-faceted manner and enable creative problem-solving and critical thinking.

21. I have also seen that a diverse and inclusive environment enables the exchange of ideas by creating opportunities for dialogue and debate. Student body diversity helps foster a vibrant classroom experience and aids in rigorous academic growth.

22. In addition, in my experience, a diverse classroom environment exposes students to classmates who hold world views different from their own and reduces bias. Students learn alongside classmates who come from many different backgrounds and experiences. This allows students to think critically about their own backgrounds and beliefs, enriching their learning experience and expanding their world-view.

23. Finally, a diverse learning and campus environment helps prepare students for participation in a diverse workforce and a multicultural society. It provides students

with the intellectual and social foundation to confront the myriad challenges they will face upon graduation.

24. As a professor I have taught research and methods courses to undergraduates. In my statistics and research methods courses, students work together on semester-long research projects in small groups, choose topics of mutual interest, navigate how to think about the topic and methods, collect data, choose analyses, analyze data, present and critique their classmates, and write about their results. Through these experiences with diverse classmates, students worked together, made efforts to understand each other's ideas and perspectives, showed empathy, and developed cultural competence.

25. As a researcher, I have also observed the educational benefits of diversity. To conduct research, I assemble teams for projects, including teams that include undergraduate students. For example, for the Finish Line Project many teams were assembled to target different aspects of the project's key research questions. These teams required a diversity of ideas, thought, perspective, and expertise to ensure that the conceptualization of questions, methodology, data collection, analyses, and reporting are rigorous and high quality.

26. I have also conducted original research to study the educational benefits of diversity. Working with collaborators at UNC-Chapel Hill, UNC-Greensboro, and the University of California at Los Angeles ("UCLA") School of Education and Information Studies, I developed the Educational Diversity Project ("EDP"). The EDP was a multi-year empirical study, which examined the relationship between race (among other

factors) and educational diversity in incoming students at U.S. law schools to determine what educational benefits diversity might bring to a law school setting, in the workplace, and in society in general. Based on our research, we found that a racially diverse law school student body provides educational benefits for students, for their institution, and for society.

B. The College creates opportunities for the realization of the educational benefits of diversity

27. The College engages in a number of initiatives and programmatic efforts to ensure that we are working to realize the educational benefits of a diverse and inclusive environment for our students. These efforts provide students with the opportunity to have quality interactions with their peers and promote student success.

28. Our curriculum is one example of these efforts with which I have been personally involved. The College has deliberately structured its curricula and academic experiences to provide students with the opportunity to interact with their peers and engage with diversity-related topics of study.

29. I am actively involved in reviews of the College's undergraduate curriculum, evaluating student learning outcomes for the University System, and developing initiatives to enhance the academic experiences of all students. Along with other senior administrators, I am responsible for ensuring that the course offerings and academic experiences within the College further the University's mission of fostering a diverse and inclusive learning environment for our students.

30. Our curriculum creates many opportunities for students to engage with and learn from one another. One example is our first-year seminar, which allows first-year students to interact with faculty and their classmates in small groups on a variety of subject matters. For example, I have taught a small first-year seminar entitled, “Talking About Numbers: Communicating Research Results to Others.”

31. Our curriculum purposefully incorporates the study of diverse and underrepresented populations. One of the curriculum requirements for College students is that they take at least one course that meets the “U.S. Diversity” requirement. These courses address, in systematic fashion, one or more aspects of diversity in the United States, whether arising from ethnic, generational, class, gender, sexual, regional, or religious differences.

32. Another curriculum requirement is that students take at least one course regarding “Global Issues.” These courses explore the interrelationships among cultures, societies, nations, and other social units, as well as global processes such as migration, urbanization, trade, diplomacy, and information flow.

33. These course offerings and high structure active learning opportunities allow our students to think critically about diversity and difference, help students understand each other and enhance their awareness of multiple cultures and perspectives, and prepare them for life in a diverse and globalized society.

34. In addition to our curricular efforts, the College has many other initiatives to foster the educational benefits of diversity. For instance, the College has diversity liaisons from each department who work with the Office of Diversity & Inclusion; a

faculty diversity initiative; student support services that provide peer mentoring, tutoring, and other student support; and global programs and study abroad opportunities.

35. The College devotes a great deal of resources to creating a learning environment in which students can experience the educational benefits of diversity. However, the success of these efforts depends on an undergraduate student body diverse along many dimensions, including racial and ethnic diversity.

III. Advisory Committee on Undergraduate Admissions

36. As previously referenced, I currently chair the Advisory Committee on Undergraduate Admissions (“Advisory Committee”), which serves in an advisory capacity to the Office of Undergraduate Admissions. I have been a member of the Advisory Committee since 2014, and have served as Chair of the Advisory Committee since 2016.

37. The Advisory Committee is composed of faculty appointees; faculty members engaged in undergraduate instruction who are appointed by the Chancellor; the Dean of the College; and academic deans, both from within the College and from other academic divisions at the University. Additionally, the Assistant Provost and University Registrar, the Vice Provost of Enrollment and Undergraduate Admissions, and the Vice Chancellor for Student Affairs are *ex officio*, non-voting members of the committee.

38. The Advisory Committee meets at least once each semester or more often as convened by the Chair. The Chair also calls a meeting whenever requested by the Vice Provost of Enrollment and Undergraduate Admissions.

39. The Advisory Committee establishes the principles that guide the admissions process and advises the Office of Undergraduate Admissions regarding the application of undergraduate admissions policy to ensure that the University's admissions practices are helping to achieve the University's mission. (Ex. 52 (Charge of the Advisory Committee on Undergraduate Admissions 2015-2016), UNC0372902-03.)

40. In particular, the Advisory Committee addresses the design and application of admissions policy, recommends guidelines for special talent and exceptional admissions, and monitors and responds to the national college admissions environment. The Advisory Committee engages in continuous discussion regarding whether admissions practices are furthering the University's mission.

41. Office of Undergraduate Admissions staff frequently provide reports about the ongoing admissions process as well as its results. This information helps the Advisory Committee assess whether admissions practices are helping to achieve the University's goals. (Ex. 53 (Advisory Committee Meeting Minutes September 30, 2014), UNC0087705.)

42. The Advisory Committee also reviews specific aspects of the admissions process when necessary, including in response to student and faculty feedback. For example, the Advisory Committee has discussed issues related to geography, international students, and transfer students. Among other things, this feedback allows Advisory Committee members to understand the experiences of students on campus and how admissions practices facilitate a diverse and inclusive campus environment.

43. Based on its work, the Advisory Committee believes that it is important to the University's mission that the University continue to admit a racially and ethnically diverse class.

44. The Advisory Committee reports to the University's Faculty Council regarding the outcomes of the current admissions cycle, as well as the Advisory Committee's activities and discussions. The Advisory Committee prepares an annual report that outlines its work during the past year and provides information about the incoming class across many dimensions, including race and ethnicity. (Ex. 54 (2014-2015 Annual Report of the Advisory Committee on Undergraduate Admissions, dated February 19, 2016), UNC0283447-65; Ex. 55 (2015-2016 Annual Report of the Advisory Committee on Undergraduate Admissions, dated February 24, 2017), UNC0237297-320.) As Chair of the Advisory Committee, I have presented to the Faculty Council regarding the incoming class and the Advisory Committee's work.

IV. Committee on Race-Neutral Strategies

45. I also chair the Committee on Race-Neutral Strategies ("the Committee"), which is charged with evaluating race-neutral admissions strategies and with advising the Office of Undergraduate Admissions about its consideration of these practices on an on-going basis. The Committee reports to the Advisory Committee. (Ex. 56 (Charge of the Committee on Race Neutral Strategies), UNC0378215.)

46. The Committee was formed to build upon the work of the Working Group on Race-Neutral Alternatives (the "Working Group"), a group convened by the Office of Undergraduate Admissions in 2013. The Working Group considered race-neutral

alternatives and conducted in-depth research and analysis on these alternatives. The Working Group's final report was submitted to the Advisory Committee in February 2016. (Ex. 50 (Exploring Race-Neutral Alternatives in Undergraduate Admissions (presented to Faculty Advisory Committee)), UNC0374120-48.)

47. Building upon the efforts of the Working Group, the Committee is independently evaluating whether there are additional race-neutral alternatives that would allow the University to achieve its mission of attaining diversity, specifically racial and ethnic diversity, in the incoming undergraduate student body, while at the same time maintaining academic quality. The task of the Committee includes considering the University's existing diversity interests and objectives; whether existing admissions practices, including the consideration of race, are necessary to help the University strive to meet those interests and objectives; and what, if any, adjustments to the current practices are warranted.

48. The Committee consists of faculty members and University administrators selected for the expertise they could contribute to the Committee. For instance, some of our members are renowned experts in quantitative and qualitative research methods. The Committee also has members who have substantial expertise concerning diversity, the student experience, educational methods, the classroom setting, and academic administration. All of the members have significant experience with the University and understand its mission from their different vantage points on campus. Office of Undergraduate Admissions staff members—including the Vice Provost for Enrollment and Undergraduate Admissions, Stephen Farmer—also attend the Committee's meetings.

49. As part of achieving its charge, the Committee focuses on the careful consideration of race within the University's current admissions process. Finally, the Committee plans to evaluate additional race-neutral alternatives. To this end, the Committee meets multiple times each semester to discuss ongoing work and next steps in the consideration of the role of race in the University's admissions practices. The Committee has met regularly since Spring 2016.

50. The Committee summarized its work through May 2018 in its Interim Report, which it shared with the Chancellor, the Executive Vice Chancellor and Provost and the Vice Provost for Enrollment and Undergraduate Admissions, Stephen Farmer. (Ex. 65 (Interim Report Examining Potential Race-Neutral Strategies in Undergraduate Admissions at University of North Carolina at Chapel Hill, dated May 2018), UNC0380278-360.) The Committee updated the Advisory Committee during its October 2018 meeting and will continue to update University Leadership and the Office of Undergraduate Admissions regarding its work as appropriate.

51. To briefly summarize the work reflected in the Interim Report, the Committee started by first seeking to understand the University's mission and diversity goals, including regarding the educational benefits of diversity and the necessity of a diverse student body to achieving those goals. The Committee engaged in a robust discussion on this topic. For example, on September 9, 2016, the Committee invited then-Executive Vice Chancellor and Provost James W. Dean, Jr. to lead a discussion about the important role of student body diversity and diversity in work settings. Many of the ideas that Provost Dean expressed during this meeting appeared in his May 2017 report, The

Educational Benefits of Diversity and Inclusion for Undergraduate Students at the University of North Carolina at Chapel Hill, which the Committee also read and reviewed. (Ex. 63 (Committee on Race-Neutral Strategy, Meeting of September 9, 2016 Minutes), UNC0283505-06.)

52. To assure that the Committee's evaluation was informed by existing legal standards and guidance, as well as the practices of other institutions, the Committee has discussed relevant legal precedent in undergraduate admissions generally and the developments at comparable, highly selective institutions in particular.

53. The Committee has also worked to understand the University's current admissions policies and practices, including the role of race within those practices. The Committee's work included consideration of information from University leaders, faculty members, and students. For example, the Committee learned about the University's admissions policies and practices through a presentation and question-and-answer session with staff members of the Office of Undergraduate Admissions, review and discussion of the University's Admissions Reading Document (Ex. 39 (Reading Document for the 2016-2017 Application Year), UNC0323603-10), and a mock evaluation of sample applications for admission.

54. The Committee met with members of the prior Working Group and then collectively identified specific ways to extend and build upon the Working Group's analyses. As a result, the Committee organized into three working subcommittees: the Literature Review Subcommittee, the Data Analytics Subcommittee, and the Subcommittee on the Impact of Diversity on the Student Experience. Each subcommittee

regularly reports to the larger Committee on its ongoing efforts and receives feedback from the group.

A. The Literature Review Subcommittee

55. The Literature Review Subcommittee, chaired by Professor Holning Lau, reviewed the current social science and legal literature on race-neutral alternative admission practices and identified relevant practices of other undergraduate institutions. This work included updating and expanding upon the literature review conducted by the Working Group. (Ex. 57 (Charge of the Literature Review Subcommittee, dated December 16, 2016 (updated January 13, 2017)), UNC0283529.)

56. The Literature Review Subcommittee identified five major categories of race-neutral strategies that are discussed in the academic literature: (1) approaches in which students who rank in the top x percent of their high school class based on class rank (“percentage plans”) are accepted; (2) approaches based on socioeconomic preferences; (3) the elimination of legacy preferences, development preferences, and early-decision programs; (4) race-neutral holistic review; and (5) enhanced recruitment. The subcommittee reviewed leading academic research on these strategies and presented their findings to the larger Committee. The Committee discussed these approaches and also discussed whether any were strategies and practices that warranted further consideration and empirical analysis.

57. The Literature Review Subcommittee will continue to identify new research and other potentially promising race-neutral alternatives to account for any new practices or reported outcomes from other institutions, should any become available.

B. The Data Analytics Subcommittee

58. The Data Analytics Subcommittee, co-chaired by Professors Patrick Curran and Michael Kosorok, is charged with analyzing specific race-neutral alternatives identified by the Committee. (Ex. 58 (Charge of the Data Analytics Subcommittee of the Race Neutral Strategies Task Force, dated November 30, 2016), UNC0283530.) The subcommittee developed infrastructure for statistical and data analyses that can be used to model and evaluate potential race-neutral alternative admissions strategies and also conducted an empirical analysis of the University's current admissions process.

59. The Data Analytics Subcommittee empirically assessed the role race currently plays in the University's admissions process. Using data from the Office of Undergraduate Admissions pertaining to five years of recent incoming classes, the Subcommittee evaluated the numerous variables considered under the current holistic admissions process. It conducted an empirical analysis of the weight of various undergraduate applicant factors considered under the current holistic admissions process during the 2016-2017 application cycle and presented its findings to the larger Committee. After completing analyses for one application cycle, it also examined whether observed findings held constant across five different cycles and for each of the five cycles separately.

60. Key findings from the empirical analysis reflect that underrepresented minority status does not meaningfully drive the prediction accuracy of the final multivariate model. In other words, an applicant's race or ethnicity does not determine

whether the applicant is accepted or rejected in the University's current admissions process.

61. The Data Analytics Subcommittee is actively continuing its work. It is currently investigating other potential data sources and methodologies for use in evaluating potential race-neutral alternatives. For example, the subcommittee is seeking and analyzing potential sources of applicant financial data in order to develop and test a race-neutral alternative based on socioeconomic status.

C. The Impact of Diversity on Student Experience Subcommittee

62. The Impact of Diversity on Student Experience Subcommittee ("Student Experience"), chaired by Associate Vice Chancellor of Student Affairs, Bettina Shuford, is using existing survey findings from University assessments of student perspectives regarding the impact of diversity, inclusion, and campus climate on their educational experiences at the University. Additionally, this subcommittee is conducting a review of the social science literature on the impact of diversity on the student experience. (Ex. 59 (Charge of the Subcommittee on the Impact of Diversity on the Student Experience), UNC0379565.)

63. The Student Experience subcommittee has analyzed existing University survey instruments that our undergraduate students at UNC-Chapel Hill regularly complete regarding campus climate, psychosocial development, student engagement, and learning outcomes.

64. The subcommittee is pursuing multiple future directions in collaboration with the Data Analytics Subcommittee. First, members of the Student Experience

subcommittee will seek to link relevant survey data to the existing undergraduate admissions data so that the extensive information provided by a student when applying for admission can be incorporated into the student experiences once on campus.

65. Second, the Student Experience subcommittee members will extend these analyses to include additional panels of data to examine stability and trends in these relations over time.

66. Third, the subcommittee members will expand the models to include data from other institutions so that they may compare and contrast the UNC-Chapel Hill experience with that reported by other universities. The Student Experience subcommittee plans to work with organizations that administer national benchmarking surveys to explore the possibility of adding additional diversity-related survey items to these benchmarking surveys.

67. Fourth, the Student Experience subcommittee members, with assistance from the University's Office of Institutional Research and Assessment will conduct modeling using national data sets starting with other surveys that UNC-Chapel Hill regularly administers. Finally, Student Experience subcommittee members will continue to review the academic literature on the theoretical models and research related to these concepts.

68. The work of the Committee and its subcommittees is ongoing. The Committee has not yet identified a workable race-neutral alternative that might replace the University's current admissions process and would allow the University to achieve its diversity objectives, including racial and ethnic diversity, in light of the University's

mission, campus climate, and the academic needs of its student body. Should the Committee identify such a race-neutral alternative, it would promptly report these findings to the Office of Undergraduate Admissions and the Advisory Committee.

69. The Committee is very invested and engaged in its work. I have been impressed by the quality of the discussions and decision-making, and the commitment of the group's members to giving full and fair consideration to race-neutral alternatives.

D. Educational Benefits of Diversity and Inclusion Working Group

70. In December 2017, as a follow up to the Provost's May 2017 report, Provost Robert Blouin convened the Educational Benefits of Diversity and Inclusion Working Group ("EBD Working Group"). The EBD Working Group's charge is to coordinate and enhance the assessment of the University's ongoing efforts to realize the educational benefits of diversity and inclusion for its undergraduate students.

71. Members of the EBD Working Group, which include University faculty and administrators from across campus, were asked to serve based on the specific skills and expertise that each individual brings to bear, including educational research and assessment; expertise in the impact and implementation of organizational diversity, equity, and inclusion; admissions and enrollment management; student advising and support; strategy; and project management.

72. The EBD Working Group's work entails, among other items, the broad collection of data about the University's progress toward achieving these benefits and the development of a formal assessment plan of the University's efforts to achieve the educational benefits of diversity.

73. The EBD Working Group met six times between December 2017 and the end of the academic year in May 2018. It convened twice over the summer and met regularly during the Fall 2018 semester and plans to continue meeting regularly during the Spring 2019 semester. (Exs. 118-21 (Educational Benefits of Diversity and Inclusion Working Group Meeting Minutes), UNC0388702, UNC0389268, UNC0389271, UNC0389062.) In addition, the Data Inventory and Assessment Plan subcommittee met between full EBD Working Group meetings to plan and review progress on specific assessment projects and initiatives.

74. One of our first steps was to build a comprehensive set of the University's existing assessments relevant to its delivery of the educational benefits of diversity and inclusion. Our initial review showed that the University has engaged in numerous assessment efforts to determine how well the University is achieving the educational benefits of diversity and to gather information about the campus climate. These instruments are described in detail in in our Status report and catalogued in the Inventory of Assessments Related to the Delivery of the Educational Benefits of Diversity and Inclusion. (Ex. 64 (The Educational Benefits of Diversity & Inclusion Working Group, Status Report for December 2017 – June 2018, dated June 25, 2018), UNC0380278-360; Ex. 122 (Inventory of Assessments Related to the Delivery of the Educational Benefits of Diversity and Inclusion), UNC0384902.)

75. For example, our Office of Institutional Research and Assessment regularly conducts surveys of students at different points in their undergraduate careers to learn about their experiences, including their experiences with diversity. The University also

engaged the Higher Education Research Institute at UCLA to conduct a campus climate survey addressing diversity issues in 2016.

76. In addition to these surveys, the University regularly receives information from its students in both formal and informal ways. In the College, for instance, our diversity liaisons serve as a critical source of information about the lived experience of students and others on campus. We also receive information from students who participate in our Student Success and Academic Counseling programs, which involve direct engagement with students through tutoring and mentoring. In addition, my teaching and research involve personal interactions with students and with faculty that allow me to hear about their experiences at the University. We also collect quantitative and qualitative data on the experiences of scholars in the Chancellor's Science Scholars Program and first generation students as part of the Finish Line Project.

77. In the Summer of 2017, the College added questions to our standard course evaluations related to the educational benefits of diversity. The feedback we have received from students indicates that the University realizes many educational benefits from our diverse student body, but that significant work remains.

78. Our early consideration of the University's existing data yielded some striking insights about undergraduate students and what they want from the University when it comes to the educational benefits of diversity and inclusion. Students newly admitted to UNC-Chapel Hill have expressed overwhelmingly their desire: (1) to engage with a broad range of ideas, perspectives, and visions that differ from their own; (2) to get better at leading, serving, and working with people from different backgrounds; and (3)

to deepen their appreciation, respect, and empathy for other people. Our students want to live and learn alongside students who differ from them because they know that doing so will help them prepare for a complex world and the lives they want to lead. We also saw that the benefits of diversity and inclusion appeared to increase over a student's time at the University. Seniors reported more benefits from interactions with people whose race/ethnicity was different from their own than first-year students.

79. Our review of the existing data informed the development of our formal assessment plan. The EBD Working Group adopted assessment principles and a framework to guide its work. We determined that assessment will occur at each stage of students' engagement with the University: before students matriculate, during their experience on campus, and as alumni.

80. We determined that our assessment efforts will continue to rely on both quantitative metrics with sufficient reliability and validity, as well as sound qualitative data, to provide rich, contextual information regarding the educational benefits of diversity and inclusion.

81. Our assessment plan also includes continuing to use and assess both existing data and the instruments currently used to collect it; evaluation and analysis of the University's existing approach to assessment; and benchmarking our current methods against approaches used by other universities.

V. Conclusion

82. I have been involved in advising the Office of Undergraduate Admissions for many years. Based on my experiences, I can attest to the necessity of the University's

admissions program seeking to both admit high quality applicants and secure the educational benefits of diversity for our students.

83. I have also been integrally involved in the University's consideration of race-neutral alternatives. Based on what I have observed, I believe the University has engaged in, and will continue to engage in, earnest, thoughtful, and high quality efforts to assess race-neutral alternatives. If the Committee on Race-Neutral Alternatives determined that a race-neutral alternative potentially could be effective in achieving diversity without sacrificing academic quality, we would engage in serious discussion with our administration and stakeholders about implementing such an alternative. To date, however, the University has not yet determined that there are race-neutral alternatives that could achieve similar levels of diversity to the University's current admissions approach (which includes race-neutral strategies) without sacrificing academic quality.

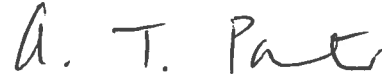
84. Based on my experiences in my different roles as discussed above, I have seen that the University is committed to realizing the educational benefits of diversity, and I believe that this commitment is necessary to fulfill the University's mission as a public institution. While the University has engaged in critical assessment work and has received student feedback for years, the EBD Working Group now serves as a centralized and deliberate effort to collect all of the University's various initiatives and further strengthen our oversight of and deliberate thinking about the achievement of these educational benefits of diversity.

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I declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the foregoing statements are true and correct.

Executed on January 17, 2019.

A handwritten signature in black ink, appearing to read "A. T. Panter".

Abigail Panter
Senior Associate Dean for
Undergraduate Education in the College
of Arts and Sciences